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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
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11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$24,900.00 IN
U.S. CURRENCY,
15
16 Defendant.

2:21-MC-00264-MCE-AC

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant
18 Christopher Fluke (“claimant”), by and through their respective counsel, as follows:
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20 1. On or about August 4, 2021, claimant filed a claim in the administrative forfeiture
21 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately
\$24,900.00 in U.S. Currency (hereafter “defendant currency”), which were seized on May 25, 2021.

22 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §
23 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the
24 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim
25 to the defendant currency as required by law in the administrative forfeiture proceeding.

26 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
27 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
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1 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
2 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
3 That deadline is November 2, 2021.

4 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
5 December 30, 2021, the time in which the United States is required to file a civil complaint for forfeiture
6 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
7 to forfeiture.

8 5. Accordingly, the parties agree that the deadline by which the United States shall be required
9 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
10 the defendant currency is subject to forfeiture shall be extended to December 30, 2021.

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12 Dated: 11/01/21

PHILLIP A. TALBERT
Acting United States Attorney


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14 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant United States Attorney

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17 Dated: 10/28/21

/s/ Carolyn Hagin Emison
CAROLYN HAGIN EMISON
Attorney for potential claimant
Christopher Fluke
(Signature authorized by email)

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21 IT IS SO ORDERED.

22 Dated: November 8, 2021

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25 MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE